

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

URGENT MOTION FOR EXTENSION OF DEADLINES

The Ad Hoc Group of General Obligation Bondholders (the “GO Group”)² respectfully submits this Urgent Motion for entry of an order, substantially in the form attached hereto as Exhibit A, extending the deadline to file and serve any replies in further support of the *Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures With Respect to Omnibus Conditional Objection of the Ad Hoc Group of General Obligation Bondholders to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds, and*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Members of the GO Group file this motion exclusively on their own behalves and do not assume any fiduciary or other duties to any other creditor or person.

Holders of Certain Commonwealth General Obligation Bonds (the “Procedures Motion,” Dkt. No. 6104). In support of the requested relief, the GO Group respectfully states as follows:

1. The GO Group filed its Procedures Motion on April 2, 2019, and, pursuant to the Court’s *Eighth Amended Notice, Case Management and Administrative Procedures* (the “Case Management Procedures,” Dkt. No. 4866-1), noticed a hearing date of April 24, 2019 with a deadline to respond or object to the Procedures Motion by April 9, 2019 at 4:00 p.m. (Atlantic Standard Time, or “AST”) (the “Objection Deadline”).

2. The Case Management Procedures require any replies in further support of the Procedures Motion to be filed by “4:00 p.m. (Atlantic Standard Time) on the date that is eight (8) calendar days before the applicable hearing date,” or April 16, 2019 at 4 p.m. AST (the “Reply Deadline”). Case Management Procedures ¶ III.K.

3. The GO Group has received requests from various parties in interest for extensions of the Objection Deadline. The parties in interest requesting an extension of the Objection Deadline have cited the demands of other professional obligations in these Title III cases and, in the case of U.S. Bank Trust National Association and U.S. Bank National Association, as fiscal agents for bonds issued by the Puerto Rico Public Buildings Authority, a desire to notify holders of such bonds regarding the filing of the Procedures Motion.

4. As a professional courtesy, the GO Group wishes to accommodate those parties that have requested extensions of the Objection Deadline. In order to do so, while also affording the GO Group sufficient time to prepare and file a reply brief that will assist the Court in its consideration of the Procedures Motion, the GO Group respectfully requests an extension of the Reply Deadline to April 19, 2019 at 4 p.m. AST.

5. Conditioned upon the extension of the Reply Deadline requested herein, the GO Group would consent to an extension of the Objection Deadline to April 15, 2019 at 4 p.m. AST. The Proposed Order attached hereto as Exhibit A reflects such an extension of the Objection Deadline.

6. Paragraph I.H of the Case Management Procedures requires that the undersigned counsel certify that they have engaged in reasonable, good-faith communications with counsel to other interested parties in an effort to resolve or narrow the issues that are being brought to the Court in this Urgent Motion. Prior to the filing of this Urgent Motion, undersigned counsel has conferred with counsel to the parties that have requested extensions of the Objection Deadline and with counsel to the Financial Oversight and Management Board for Puerto Rico, acting through its Special Claims Committee. These parties have not notified undersigned counsel of any objection to the relief requested herein. The GO Group respectfully submits that, in light of the nature of the relief requested herein, no further communications are necessary under the circumstances.

* * *

For the foregoing reasons, the GO Group respectfully requests entry of an order substantially in the form attached hereto as Exhibit A.

[Remainder of page intentionally left blank.]

Dated: April 5, 2019

/s/ Ramón Rivera Morales
J. Ramón Rivera Morales
USDC-PR Bar No. 200701
Andrés F. Picó Ramírez
USDC-PR Bar No. 302114
JIMÉNEZ, GRAFFAM & LAUSELL
P.O. Box 366104
San Juan, PR 00936
Telephone: (787) 767-1030
Facsimile: (787) 751-4068
Email: rrivera@jgl.com

Respectfully submitted,

/s/ Lawrence S. Robbins
Lawrence S. Robbins
Mark T. Stancil
Gary A. Orseck
Kathryn S. Zecca
Donald Burke
ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP
2000 K Street, N.W., 4th Floor
Washington, DC 20006
Telephone: (202) 775-4500
Email: lrobbins@robbinsrussell.com

Counsel to the Ad Hoc Group of General Obligation Bondholders